

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DAVID HARRELL, *individually and on
behalf of all others similarly situated,*

Plaintiff,

v.

WEBTPA EMPLOYER SERVICES, LLC;
HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY; ANTHEM
BLUE CROSS LIFE AND HEALTH
INSURANCE COMPANY; and
ELEVANCE HEALTH, INC.,

Defendants.

Civil Action No.: 3:24-cv-01158-L

Consolidated Action

**JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY
ALL DEADLINES PENDING APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs and Defendants hereby jointly provide notice to the Court that the Parties have mediated and reached an agreement in principle on the material terms of a classwide settlement. The Parties intend to file their comprehensive settlement agreement along with Plaintiffs' Motion for Preliminary Approval within 30 days of today, which is on or before February 28, 2025.

In light of the settlement, the Parties respectfully move the Court for an order continuing the stay ordered by the Court on September 30, 2024 (DE# 59), pending the filing of the Plaintiffs' Motion for Preliminary Approval and thereafter a Motion for Final Approval of the settlement.

Should the settlement agreement not receive final approval by the Court, or the stay otherwise be lifted without a settlement, Defendants respectfully request that Defendants' deadline to answer or otherwise respond to Plaintiffs' Consolidated Complaint would be 60 days after an order reopening the case.

Dated: January 29, 2025.

Respectfully Submitted,

/s/ Jeff Ostrow

Jeff Ostrow (*pro hac vice*)

KOPELOWITZ OSTROW P.A.

1 W. Las Olas Blvd., Ste. 500

Fort Lauderdale, FL 33301

Telephone: (954) 332-4200

ostrow@kolawyers.com

Gary Klinger (*pro hac vice*)

MILBERG COLEMAN BRYSON

PHILLIPS GROSSMAN, PLLC

227 W. Monroe Street, Suite 2100

Chicago, IL 60606

Telephone: (866) 252-0878

gklinger@milberg.com

Interim Co-Lead Counsel

/s/ Blayne Thompson

Blayne Thompson

Texas Bar No. 24088525

HOGAN LOVELLS US LLP

609 Main St., Suite 4200

Houston, TX 77002

Tel: (713) 632-1400

Fax: (713) 632-1401

blayne.thompson@hoganlovells.com

Allison Holt Ryan (*pro hac vice*)

Abby Walter Gray (*pro hac vice*)

HOGAN LOVELLS US LLP

Columbia Square

555 Thirteenth Street, NW

Washington, DC 20004

Tel: (202) 637-5600

Fax: (202) 637-5910

allison.holt-ryan@hoganlovells.com

abby.waltergray@hoganlovells.com

Hans H. Hertell (*pro hac vice*)

HOGAN LOVELLS US LLP

600 Brickell Ave., Suite 2700

Miami, FL 33131

Tel.: (305) 459-6500

Fax: (305) 459-6550

hans.hertell@hoganlovells.com

*Counsel for WebTPA Employer Services, LLC;
Hartford Life and Accident Insurance
Company;*

*Elevance Health, Inc.; and Anthem Blue Cross
Life*

and Heath Insurance Company

LOCAL RULE 7.1 CERTIFICATION

I HEREBY CERTIFY that on January 29, 2025, Parties have agreed to the relief requested herein.

/s/ Jeff Ostrow
Jeff Ostrow

LOCAL RULE 42.1 CERTIFICATION

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon all counsel of record for each party in the above-captioned action via electronic mail on this 29th day of January, 2025.

/s/ Jeff Ostrow
Jeff Ostrow